

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
)	
NEW ENGLAND GAS COMPANY;)	
SOUTHERN UNION COMPANY)	
Defendant and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.)	
Third-Party Defendants.)	

JOINT MOTION TO AMEND PRETRIAL ORDER

Pursuant to Fed.R.Civ.P. 26 and LR Cv 26, Third Party Plaintiff Southern Union Company/ New England Gas Company (collectively, “Southern Union”) and Third-Party Defendants Bridgestone Americas Tire Operations, LLC (“Bridgestone”) and Honeywell International Inc. (“Honeywell”) jointly request that the Court amend its Pretrial Order entered on May 29, 2012, by amending the dates contained therein as follows:

1. All factual discovery closed by: October 12, 2012
2. All expert discovery closed by: March 29, 2013
3. Dispositive motions filed by: April 26, 2013
4. Third-Party Plaintiff expert witness disclosures: November 30, 2012
5. Third-Party Defendants’ expert witness disclosures: January 25, 2013
6. Pretrial Memoranda, if no dispositive motions: April 26, 2013
(or 30 days after decision on dispositive motions)

In support of this joint motion, the parties state that Southern Union and Bridgestone engaged in mediation, reached a settlement in principle and are working on final settlement documents. Southern Union and Honeywell are mediating in mid-August 2012. As such, the parties would like this extension of pre-trial deadlines to conduct mediation and complete settlement documentation. If no settlement is reached, the parties must then complete remaining fact discovery and then engage in other pre-trial work. The parties respectfully request that the Court amend the Pretrial Order by extending the dates as set forth above.

SOUTHERN UNION COMPANY AND
NEW ENGLAND GAS COMPANY

By its Attorneys,

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Dated: July 30, 2012

CERTIFICATE OF SERVICE

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I hereby certify that on the 30th day of July, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

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